

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN

IN RE:

CITY OF DETROIT

Debtor.

Chapter 9

Case No. 13-53846

Hon. Thomas J. Tucker

**MOTION TO WITHDRAW AS COUNSEL**

John F. Rhoades, of Dykema Gossett PLLC, hereby moves the Court pursuant to Local Rule 9010-1 to withdraw as counsel for Pike Pointe Holdings, LLC. The reason for the withdrawal is that the motion filed on behalf of Pike Pointe Holdings, LLC [Dkt. No. 13170] has been withdrawn [Dkt. No. 13179].

Dated: January 14, 2020

Respectfully submitted,

DYKEMA GOSSETT PLLC

By: /s/ John F. Rhoades  
John F. Rhoades (P75575)  
jrroad@dykema.com  
400 Renaissance Center  
Detroit, Michigan 48243  
(313) 568-6800  
*Attorneys for Pike Pointe  
Holdings, LLC*

DYKEMA GOSSETT PLLC • 400 Renaissance Center, Detroit, Michigan 48243

**CERTIFICATE OF SERVICE**

I hereby certify that on January 14, 2020, a copy of the foregoing MOTION TO WITHDRAW AS COUNSEL was electronically filed with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record.

/s/ John F. Rhoades

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# EXHIBIT 1

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN

IN RE:

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Chapter 9

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Hon. Thomas J. Tucker

**NOTICE OF OPPORTUNITY TO RESPOND TO MOTION TO  
WITHDRAW AS COUNSEL**

Counsel for Pike Pointe Holdings, LLC has filed papers with the court to withdraw as counsel.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to ENFORCE DEVELOPMENT AGREEMENT, or if you want the court to consider your views on the MOTION TO ENFORCE DEVELOPMENT AGREEMENT, within 14 days, or a shorter period of time as the Court may allow, you or your attorney must:

1. File with the court a written response or an answer, explaining your position at:<sup>1</sup>

**United States Bankruptcy Court**  
211 West Fort Street  
Detroit, Michigan 48226

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. All attorneys are required to file pleadings electronically.

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1 Response or answer must comply with F. R. Civ. P. 8(b), (c) and (e)

You must also send a copy to:

DYKEMA GOSSETT PLLC  
John F. Rhoades, jrhoades@dykema.com  
400 Renaissance Center  
Detroit, Michigan 48243  
(313) 568-6800  
*Attorneys for Pike Pointe Holdings, LLC*

2. If a response or answer is timely filed and served, the clerk may schedule a hearing on the motion and you will be served with a notice of the date, time and location of the hearing.

**If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.**

Dated: January 14, 2020

Respectfully submitted,

DYKEMA GOSSETT PLLC

By: /s/ John F. Rhoades  
John F. Rhoades  
jrhoades@dykema.com  
400 Renaissance Center  
Detroit, Michigan 48243  
(313) 568-6800  
*Attorneys for Pike Pointe Holdings, LLC*

# EXHIBIT 2

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN

IN RE:

CITY OF DETROIT,

Debtor.

Chapter 9

Case No. 13-53846

Hon. Thomas J. Tucker

**[PROPOSED] ORDER OF WITHDRAWAL OF  
JOHN F. RHOADES AS COUNSEL  
OF RECORD FOR PIKE POINTE HOLDINGS, LLC**

IT IS ORDERED that John F. Rhoades of Dykema Gossett PLLC is withdrawn as counsel for Pike Pointe Holdings, LLC in this case. This withdrawal does not affect any other appearance entered by the Court.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Thomas J. Tucker